



**Montana Department of
ENVIRONMENTAL QUALITY**

Brian Schweitzer, Governor

P.O. Box 200901 • Helena, MT 59620-0901 • (406) 444-2544 • www.deq.mt.gov

February 27, 2008

TO: All Asbestos Abatement Contractors

Re: Asbestos Abatement Project Direct Associated and Non-Associated Costs

The Montana Department of Environmental Quality Asbestos Control Program (ACP), in discussion with counsel, intends to issue the attached interpretation of ARM 17.74.401(2) Permits Fees for associated and non-associated costs.

This interpretation is being presented to contractors for input and discussion before a final decision is made. Comments, suggestions, etc., regarding this interpretation should be made in writing and directed to the Asbestos Control Program via fax to (406) 444-1374, through the ACP contact page at <http://deq.mt.gov/mail/AsbestosMail.asp>, or mailed to the address on this letterhead to the attention of the Asbestos Control Program.

Comments, etc., should reach this office by March 12, 2008, to be considered. If you have any further questions or comments, please contact the ACP program at (406) 444-5300.

Sincerely,

PIERRE AMICUCCI
Asbestos Control Program
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Asbestos Abatement Project Associated and Non-Associated Costs		
Type of Cost	Cost Description	Comments
Associated	Prep - Pre-Cleaning/Set up	
Associated	Tear Down	
Associated	Mobilization/Demobilization	This is the loading and unloading of equipment and personnel. State stance is that this is a non-associated cost.
Associated	Removal and Disposal of Asbestos	
Associated	Prepare Site Specific Project Design	
Associated	Prepare and File State Application	
Associated	Time and Material Basis	
Associated	Indirect Costs (SS, Medicate, etc.)	Determined to be an associated costs as it is presumed included in the labor wage; if not included in the labor wage, this costs is as associated cost.
Associated	Owner will provide electrical (\$200)	When the owner can not provide electrical power and the owner is charged by the contractor because the contractor has to provide electricity via other means (i.e., generator).
Associated	Owner will provide sufficient water and sewer (\$200)	When the owner can not provide sufficient water and sewer and the owner is charged by the contractor because the contractor has to provide equipment, etc., that will provide sufficient water and portability and disposal of waste water, etc.
Associated	Personal Air Monitoring	Required with every abatement project.
Non-Associated	Air Clearances	Third-Party charge that state stance is that it not be associated.
Non-Associated	Pay and Performance Bonds	This is not required by the state to conduct an asbestos abatement project.
Non-Associated	Insurance	This is not required by the state to conduct an asbestos abatement project.
Non-Associated	MDEQ Asbestos Permit Fee	Non-associated by ARM 17.74.401(2).

Asbestos Abatement Project Associated and Non-Associated Costs		
Type of Cost	Cost Description	Comments
Non-Associated	Time, Travel, Per Diem to Project Site	Not necessary to conduct an asbestos abatement project.
Non-Associated	Initial Asbestos Inspection	Although an inspection is required for all buildings, State stance is that this be a non-associated cost.
Non-Associated	Subsequent Asbestos Inspection	If a subsequent asbestos inspection is required and that inspection cost is charge to the customer/client thereby raising the contract volume, the cost is then an associated cost and the applicable 10% fee is due.